

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,
on behalf of themselves and all those similarly
situated

Plaintiffs,

v.

CITY OF BUFFALO, *et al.* ;

Defendants.

No. 1:18-cv-719

**MOTION TO SHORTEN TIME RE:
MOTION FOR ISSUANCE OF SUBPOENA TO NEW YORK
STATE DEPARTMENT OF MOTOR VEHICLES**

On the Declaration of Edward P. Krugman (ECF #104-3), executed on September 6, 2021 and submitted in support of Plaintiffs' motion (ECF #104) for an order approving the issuance of a subpoena *duces tecum* to the New York State Department of Motor Vehicles ("DMV"), Plaintiffs hereby move to shorten time on the motion for issuance. As set forth in the Krugman Declaration, Counsel for Defendants was first asked to consent to the motion for issuance on July 20, 2021 and has been asked again three times since then. Counsel has not taken a position one way or the other but has merely said he would consider the matter and get back to Plaintiffs. The motion to shorten time is brought to prevent Defendants' obstructive conduct from delaying this action any more than it already has.

Plaintiffs request that answering papers on the motion for issuance be made due September 10, 2021, reply papers on September 14, and the motion returnable September 17.

[Signatures follow]

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Dated: September 6, 2021

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2021, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Edward P. Krugman